



**COUNTY OF ALAMEDA  
PUBLIC WORKS AGENCY**

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Governor's Office of Planning and Research  
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Subject: Comments on Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions.

The Alameda County Public Works Agency appreciates the opportunity to provide the following comments on the Draft CEQA Guideline Amendments for the Greenhouse Gas Emissions.

1. In general, the Agency believes the proposed amendments provide substantial direction to Lead Agencies in addressing the challenges posed by GHG. Retaining the existing discretionary authority of the Lead Agency to determine the threshold of significance is appropriate. This allows time for the evolution of the science and modeling required in analyzing GHG emissions.
2. It is recommended that a statement of intent should be included in each amended section to further guide Lead Agencies during preparation of EIRs. And also, consider including a range of frequently asked questions (FAQs) as a guide in the introduction section that precedes the checklist items.
3. **Mandatory Findings of significance (Section 15065 (b)(1)):** The modified statement "Prior to Completion of preliminary review...." requires some clarification. The determination of the level of environmental documents needed is dependent on the preliminary review completion.
4. How do you modify the checklist to include pedestrian and cyclist (inherent conflicts with traffic) in the calculus of VMT? Is there an alternative to LOS analysis to accommodate non-motorized vehicles?

The Agency appreciates the opportunity to comment on the Draft CEQA amendment. If you have any question please contact me at 510/670-5772.

Yours truly,

  
Kwablah Antogbe  
Environmental Services Section